

**WEST VIRGINIA DIVISION OF ENVIRONMENTAL PROTECTION  
OFFICE OF AIR QUALITY**

**FACT SHEET  
FOR PROPOSED PERMITTING ACTION  
UNDER 45 C.S.R. 30 (TITLE V-CLEAN AIR ACT)**

R30-03300018-1996

**APPLICANT:**

03300018  
Consolidation Coal Company  
Robinson Run Preparation Plant  
PO Box 100  
Osage, WV 26543

**FACILITY LOCATION:**

Shinnston, Harrison County  
UTM Coordinates are ZONE: 17 EASTING:554.82 km NORTHING:4361.54 km

**FACILITY DESCRIPTION:**

Consolidation Coal Company's Robinson Run facility operates an 1,800 tons per hour coal preparation plant. The facility has the potential to operate seven (7) days per week, twenty-four (24) hours per day and fifty-two (52) weeks per year.

**EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION:**

The following table provides a list of all equipment and air emission sources which are authorized to operate at the subject facility, but which have no applicable requirements. Note that additional equipment (those subject to an applicable requirement) are listed in the permit and are not contained below.

Source ID	Emission Point ID	Equipment Description	Design Capacity	Year Installed
047	047	Rock Dust Bin 1	N/A	1968
049	049	Sand Silo 1	N/A	1968
051A	051A	No. 2 Diesel Fuel Storage Tank 1	8,000 Gallon	N/A
051B	051B	No. 2 Diesel Fuel Storage Tank 2	5,000 Gallon	N/A
051C	051C	Froth Flotation Agent Storage Tank 1	3,000 Gallon	N/A
051D	051D	Anionic Flocculant Storage Tank	1,000 Gallon	N/A
051E	051E	Cationic Flocculant Storage Tank 1	500 Gallon	N/A

051F	051F	Cationic Flocculant Storage Tank 2	500 Gallon	N/A
051G	051G	Lubricating Oil Storage Tank 1	1,000 Gallon	N/A
051H	051H	Hydraulic Oil Storage Tank 1	1,000 Gallon	N/A
010A	P001	Vacuum Filtration Unit 1	N/A	N/A
010B	010B	Froth Flotation Unit 1 (Prep Plant)	N/A	N/A
050	050	Thickener 1	N/A	N/A
020A	020A	Anti-freeze Spray	N/A	N/A

### **INSIGNIFICANT ACTIVITIES:**

The following is a list of all insignificant emission units or activities which may be operated at this facility: C.S.R. § 45-30-3.2.d

1. Air compressors and pneumatically operated equipment, including hand tools.
2. Air contaminant detectors or recorders, combustion controllers or shutoffs.
3. Any consumer product used in the same manner as in normal consumer use, provided the use results in a duration and frequency of exposure which are not greater than those experienced by consumers, and which may include, but not be limited to, personal use items; janitorial cleaning supplies, office supplies and supplies to maintain copying equipment.
4. Bathroom/toilet vent emissions.
5. Batteries and battery charging stations, except at battery manufacturing plants.
6. Bench-scale laboratory equipment used for physical or chemical analysis, but not lab fume hoods or vents. Many lab fume hoods or vents might qualify for treatment as insignificant (depending on the applicable SIP) or be grouped together for purposes of description.
7. Brazing, soldering or welding equipment used as an auxiliary to the principal equipment at the source.
8. Combustion emissions from propulsion of mobile sources, except for vessel emissions from Outer Continental Shelf sources.
9. Combustion units designed and used exclusively for comfort heating that used liquid petroleum gas or natural gas as fuel.
10. Comfort air conditioning or ventilation systems not used to remove air contaminants generated by or released from specific units of equipment.
11. Equipment on the premises of industrial and manufacturing operations used solely for the

- purpose of preparing food for human consumption.
12. Fire suppression systems.
  13. Firefighting equipment and the equipment used to train firefighters.
  14. Flares used solely to indicate danger to the public.
  15. Fugitive emission related to movement of passenger vehicle provided the emissions are not counted for applicability purposes and any required fugitive dust control plan or its equivalent is submitted.
  16. Hand-held equipment for buffing, polishing, cutting, drilling, sawing, grinding, turning or machining wood, metal or plastic.
  17. Indoor or outdoor kerosene heaters.
  18. Internal combustion engines used for landscaping purposes.
  19. Laundry activities, except for dry-cleaning and steam boilers.
  20. Natural gas pressure regulator vents, excluding venting at oil and gas production facilities.
  21. Plant maintenance and upkeep activities (e.g., grounds-keeping, general repairs, cleaning, painting, welding, plumbing, re-tarring roofs, installing insulation, and paving parking lots) provided these activities are not conducted as part of a manufacturing process, are not related to the source's primary business activity, and not otherwise triggering a permit modification. (Cleaning and painting activities qualify if they are not subject to VOC or HAP control requirements. Asphalt batch plant owners/operators must get a permit if otherwise requested.)
  22. Process water filtration systems and demineralizers.
  23. Repair or maintenance shop activities not related to the source's primary business activity, not including emissions from surface coating or de-greasing (solvent metal cleaning) activities, and not otherwise triggering a permit modification.
  24. Routine calibration and maintenance of laboratory equipment or other analytical instruments.
  25. Space heaters operating by direct heat transfer.
  26. Steam cleaning operations.
  27. Storage tanks, reservoirs, and pumping and handling equipment of any size containing soaps, vegetable oil, grease, animal fat, and nonvolatile aqueous salt solutions, provided appropriate lids and covers are utilized.

28. Storage tanks, vessels, and containers holding or storing liquid substances that will not emit any VOC or HAP. Exemptions for storage tanks containing petroleum liquids or other volatile organic liquids should be based on size limits such as storage tank capacity and vapor pressure of liquids stored and are not appropriate for this list.
29. Vents from continuous emissions monitors and other analyzers.

**EMISSIONS SUMMARY:**

PLANTWIDE EMISSIONS SUMMARY [TONS PER YEAR]		
CRITERIA POLLUTANTS	POTENTIAL EMISSIONS	1997 ACTUAL EMISSIONS
Particulate Matter (PM)	259.7	82.4
Particulate Matter (PM <sub>10</sub> )	125.8	40.9
Volatile Organic Compounds (VOC)	37.9	18.5

**TITLE V PROGRAM APPLICABILITY BASIS:**

This facility has the potential to emit 125.8 tons per year of PM<sub>10</sub>. Due to this facility's potential to emit over 100 tons per year, Consolidation Coal Company is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45 C.S.R. 30.

**LEGAL AND FACTUAL BASIS FOR DRAFT PERMIT CONDITIONS:**

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Regulations for the purposes of Title V of the Federal Clean Air Act (45 C.S.R. 30), and underlying applicable requirements in other state and federal rules. Applicable requirement means all of the following as they apply to emission units in a Title V source:

- a. Any standard or other requirement provided for in the State Implementation Plan approved by the United States Environmental Protection Agency (USEPA) or promulgated by USEPA through rulemaking under Title I of the Clean Air Act that implements the relevant requirements of the Act, including any revisions to that State Implementation Plan;
- b. Any term or condition of any preconstruction permits issued pursuant to regulations approved or promulgated through rulemaking under Title I, including parts C and D, of the Clean Air Act, including any permits issued under 45 C.S.R. 13, 45 C.S.R. 14, 45 C.S.R. 15, and 45 C.S.R. 19;

- c. Any standard or other requirement under §111 of the Clean Air Act, including §111(d);
- d. Any standard or other requirements under §112 of the Clean Air Act, including any requirement concerning accident prevention under §112(r)(7) of the Clean Air Act, but not including the contents of any risk management plan required under §112(r) of the Clean Air Act;
- e. Any standard or other requirement of the acid deposition control program under Title IV of the Clean Air Act or the regulations promulgated thereunder;
- f. Any requirements established pursuant to §504(b) or §114(a)(3) of the Clean Air Act;
- g. Any standard or other requirement governing solid waste incineration under §129 of the Clean Air Act;
- h. Any standard or other requirement for consumer and commercial products under §183(c) of the Clean Air Act;
- i. Any standard or other requirement for tank vessels under §183(f) of the Clean Air Act;
- j. Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Clean Air Act, unless the Director determines that such requirements need not be contained in a Title V permit pursuant to an exemption by USEPA;
- k. Any national ambient air quality standard or increment or visibility requirement under part C of Title I of the Clean Air Act, but only as it would apply to temporary sources permitted pursuant to §504(e) of the Clean Air Act;
- l. Any emissions cap and related requirements established for the source by agreement with the Chief and USEPA or otherwise applicable under the rules implemented by the Director; and
- m. Any requirement imposed pursuant to the provisions of 45 C.S.R. 27 or any other State-only requirement for State enforceable purposes only.

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45 C.S.R. 30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the state but is not federally-enforceable is identified in the draft Title V permit as such.

This facility has been found to be subject to the requirement set forth in items “a” and “c” above, specifically including the following applicable regulations:

**Federal and State:**

45 C.S.R. 6 - Open burning prohibited  
45 C.S.R. 11 - Standby plans for emergency episodes  
WV Code §22-5-4(14) - The Chief can request any pertinent information such as annual emission inventory reporting  
45 C.S.R. 30 - Operating permit requirement  
40 C.F.R. 61 - Asbestos inspection and removal  
45 C.S.R. 5 - Control of particulate matter from coal preparation plants  
40 C.F.R. 60 - Requirements for coal preparation plants

**State Only:**

45 C.S.R. 4 - No objectionable odors  
45 C.S.R. 1 - Prevent and control air pollution from coal refuse

**NON-APPLICABILITY DETERMINATIONS:**

None

**REQUEST FOR VARIANCES OR ALTERNATIVES:**

None

**TECHNICAL SUPPORT INFORMATION**

**Stockpiles, haulroads, and vehicular activity exempted from opacity periodic monitoring.**  
Under 45CSR5, all coal preparation plants and coal handling operations are required to be equipped with a fugitive dust control system as such the opacity standard applies facility-wide; however, as a practical matter emissions from stockpile wind erosion, haulroads, and vehicular activity are exempted from the requirement to periodically monitor opacity because of the nature of the emissions occurring over such a large area. This exemption does not apply to load-in or loadout from the stockpiles. The facility does have the duty to minimize dust generation and atmospheric entrainment from stockpiles, haulroads, and vehicular activity.

**COMMENT PERIOD:**

Beginning Date: 11/30/98

Ending Date: 12/30/98

All written comments should be addressed to the following individual and office:

Lisa A. McClung  
Title V Permit Writer  
WV Division of Environmental Protection  
Office of Air Quality  
1558 Washington Street, East  
Charleston, WV 25311-2599

**PROCEDURE FOR REQUESTING PUBLIC HEARING:**

During the public comment period any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Chief shall grant such a request for a hearing if he concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

**POINT OF CONTACT:**

Lisa A. McClung  
Title V Work Group  
WV Division of Environmental Protection  
Office of Air Quality  
1558 Washington Street, East  
Charleston, WV 25311-2559  
Phone: (304) 558-0885 Fax: (304) 558-1222